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COMMISSION  
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COUNSEL

OCT 19 11 20 AM '00

UNITED STATES SENATE  
FEDERAL ELECTIONS COMMISSION

In the Matter of

Anne McDonald

-against-

Hillary Rodham, as candidate  
for the Public Office of United  
States Senator from the State  
of New York

-and-

William J. Cunningham, III, as  
Treasurer of the "Hillary Rodham  
Clinton for U.S. Senate Committee,  
Inc." committee

MUR 5120  
COMPLAINT

STATE OF NEW YORK )

) ss.:

COUNTY OF ALBANY )

Anne McDonald, being duly sworn, deposes and says as follows:

1. I am a resident of the State of New York and am qualified to vote in the 2000 General Election and I reside in Ticonderoga, New York and am registered to vote from P.O. Box 391, Ticonderoga, New York 12883-0391. I submit this complaint because I believe that the "Hillary Rodham Clinton for U.S. Senate Committee, Inc." committee may have violated the Federal Election Law.

21-04-403-4572

21-04-403-4573

2. Upon information and belief, the "Hillary Rodham Clinton for U.S. Senate Committee, Inc." committee mailed a fundraising letter to more than 350,000 individuals.

3. Upon information and belief, approximately 1,400 of the solicitations were mailed to individuals whose names and addressess were obtained from an official list of visitors to the White House.

4. Upon information and belief, and based upon a news paper report appearing in the New York Times on October 13, 2000 (see attachment), Mrs. Clinton's campaign acknowledged that Mrs. Clinton played a role in transferring the 1,400 names from the official White house visitation list to her campaign committee ("Hillary Rodham Clinton for U.S. Senate Committee, Inc.").

5. The official White House visitation list is an item of value and pursuant to Federal Law such would be deemed a contribution. 11 CFR §100.7. As the official White House visitation list from which Mrs. Clinton obtained names to be used for fundraising solicitations is property of the United States government, it is improper to use it for political purposes and would be an unlawful contribution as it would be from a prohibited source.

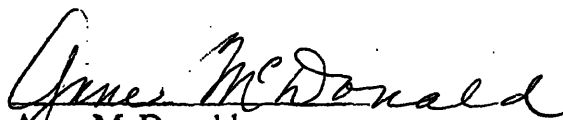
6. Furthermore, upon information and belief, the receipt of the official White House visitation list and/or the names contained within such list was not

21-04-403-4574  
reported within the FEC filings of the "Hillary Rodham Clinton for U.S. Senate Committee, Inc." committee. As such, the Federal Election Commission's reporting provisions have been violated.

7. Upon information and belief, even if the use of the official White House visitation list was deemed to be a permissive contribution, it would exceed legal contribution limits and would be in violation of Federal Law.

8. Upon information and belief, the "Hillary Rodham Clinton for U.S. Senate Committee, Inc." committee has received contributions from the solicitations mailed from the use of the official White House visitation list and has not refunded such contributions.

9. I respectfully request that an immediate investigation of these matters be commenced and that the "Hillary Rodham Clinton for U.S. Senate Committee, Inc." committee be required to comply with the Election Law.

  
Anne McDonald

Signed and sworn to  
before me this 18<sup>th</sup> day  
of October 2000.

  
Notary Public

PATRICIA L. CLUTE  
Notary Public, State of New York  
Qualified in Saratoga County 4609406  
Commission Expires 12/31/20 01

# Mrs. Clinton Raised Funds Improperly

## Use of White House List Was Error, Aide Says

By CLIFFORD J. LEVY

The Senate campaign of Hillary Rodham Clinton obtained 1,400 names from an official government list of visitors to the White House and sent them solicitations for political contributions last month. Mrs. Clinton's campaign acknowledged yesterday that she had played a role in the transfer of the names, though the campaign insisted that what happened was accidental.

The fund-raising solicitations were signed by President Clinton, who wrote: "We Democrats better do everything in our power to make sure that her voice is heard in the U.S. Senate."

A spokesman for Mrs. Clinton's campaign, Howard Wolfson, said the transfer of the names occurred while Mrs. Clinton was preparing for the annual White House holiday parties last December. She was exam-

ining an official list of people who were to receive invitations. At the same time, he said, she was looking at lists of political supporters, in an effort to organize fund-raising events for her campaign.

He said the official visitor list was inadvertently mixed in with the political lists. "This happened once — it should not have happened — and it will not happen again," he said.

The annual holiday events at the White House are customarily paid for by the political party that controls the presidency. But the invitation list is considered government property and it is considered improper to use it for political purposes.

The disclosure that the campaign received the names comes as Mrs. Clinton's Republican opponent, Representative Rick A. Lazio, has repeatedly criticized her fund-raising practices. Mr. Lazio has said that like her husband, Mrs. Clinton has rewarded political contributors with invitations to stay in the Lincoln Bedroom of the White House, and has also used other government resources for inappropriate political purposes.

The transfer of the names recalls an inquiry in 1997 by Congressional Republicans, who contended that the re-election campaign of President Clinton and the Democratic National Committee had used an extensive White House database of names for fund-raising. The Democrats denied the charges.

Told yesterday of the transfer of the names to Mrs. Clinton's campaign, the Lazio campaign stepped up its attacks on her integrity.

"It's a shame, though it is not surprising, to find the White House illegally helping

Continued on Page B5

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## Mrs. Clinton Raised Some Funds Improperly

Continued From Page B1

Mrs. Clinton's campaign," said Dan McLagan, a spokesman for the Lazio campaign. "Those lists, like the Lincoln Bedroom, belong to the American taxpayers, and Mrs. Clinton is treating them like her personal property."

Mr. Wolfson said Mrs. Clinton's campaign had not received any other names from official White House lists. He said the campaign had obtained the 1,400 names only because the official list was not removed from the political lists before they were returned to the campaign.

The official list was later entered into the campaign's fund-raising rolls, he said. Of the 1,400 names transferred, 400 were of people who were not already on the rolls. From those 400 people, the campaign has received five donations totaling \$225, and is returning the money to the contributors, Mr. Wolfson said.

Mr. Wolfson said more than 350,000 people received the fund-raising letters signed by the president.

He said the 400 names had been purged from the campaign's lists.

So, please send her as generous a contribution as you can afford as she enters the next critical stage of this campaign season. Your immediate gift now will pull her through to victory.

Sincerely,

*Bill Clinton*

Bill Clinton

More than 350,000 people received this fund-raising letter from Hillary Rodham Clinton's Senate campaign, signed by President Clinton.

Among the 400 were people with White House press credentials, including journalists from ABC News and The New York Times.

In 1997, Congressional Republicans investigating what they termed the fund-raising improprieties of President Clinton's 1996 campaign, contended that administration officials had transferred a White House database containing about 350,000 names to the Democratic National Committee, where, the Republicans said, the database was used for fund-raising. Government officials had compiled the database to track visi-

tors to the White House and put together invitation lists for White House events.

The Clinton administration denied those accusations. But the Republicans said memorandums they had obtained showed that Mrs. Clinton and an adviser in her current campaign, Harold M. Ickes, who was then deputy chief of staff, were involved in the decisions about how to manage the database.

Mr. Wolfson, responding to the criticism from the Lazio campaign, sought to link Mr. Lazio to Representative Dan Burton of Indiana, a leader of the Republican inquiries into the fund-raising by the president's campaign.

"Rick Lazio is sounding more and more like Dan Burton and the Republican attack machine every day," Mr. Wolfson said. "New Yorkers are tired of the politics of insults."

The three-page fund-raising letter signed by President Clinton reflects his attempt to assist his wife's campaign while remaining somewhat out of the spotlight. Mr. Wolfson said that other than signing the letter, the president had no involvement in the solicitation, and did not know about the transfer of the names.

21-04-403-4576